

EXHIBIT A

**IRUKE LEGAL INC.
EMPIRE GLOBAL PARTNERS, LLC.**

5718 Westheimer Ste. 1000,
Houston, Texas 77057, USA

Texas Bar Card Number: 24062796/ California Bar Number: 282096

Email: lion@empireglobal.partners

Phone Number: 972-370-3203

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1/30/23
T. Don

CONFIDENTIAL

January 29, 2023

ATTN: DEFAMATION CEASE AND DESIST NOTICE ON BEHALF OF ANDREW TATE AND TRISTAN TATE

Attn:

Emma Aida Gabbey (Respondent)
1647 Park Tree Place
Delray Beach, FL 33445

Tabbara Mona (Respondent)
1647 Park Tree Place
Delray Beach, FL 33445

William Gabbey (Respondent)
1647 Park Tree Place
Delray Beach, FL 33445

RE: REQUEST TO CEASE AND DESIST ALL DEFAMATION, SLANDER, AND/OR LIBEL OF CHARACTER AND REPUTATION

NOTICE OF DELIBERATE MISUSE

Dear Respondent(s),

If you are represented by legal counsel, please direct this letter to your attorney immediately and have your attorney notify us of such representation. This law firm represents Mr. Andrew Tate and Tristan Tate ('Client'), and it has been brought to our attention that Emma Aida Gabbey ('you' or 'Respondent') have been repeating false and defamatory statements to third parties about our Client. We have also received notice that Tabbara Mona ('Respondent') and William Gabbey ('Respondent'), have been further repeating these false and defamatory claims about our Client to various third parties.

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You are hereby notified to cease and desist any and all further unlawful defamation, slander, and/or libel with regard to your actions and/or statements relating to our Client. Specifically, in April 2022, you falsely stated to a third party that our Client human trafficked you, abused you, and held you against your will at Andrew Tate and Tristan Tate's ('Tate Brothers') Romanian residence. You further stated and repeated to a third party that you were not allowed to leave during your stay at the Tate Brother's residence, although you were allowed to leave at any time. You also repeated that the Tate Brothers have criminal ties to the Russian and Romanian mafia.

Under Florida law, defamation is defined as a false statement to a third party, whether oral or written, that is so damaging when considered by itself tends to expose a person to contempt, ridicule, disgrace, or disgust; injures a person in a trade or profession; or statements made about a person in a crime involving moral turpitude [. . .]. Slander per se is a false statement spoken out loud to a third party that is so offensive on its face that the law has presumed the slanderous nature of the statement. Libel per se is defined the same as slander per se, but its communication must be written or recorded.

We deny that the aforementioned false statements said by you to any third parties are true. You have repeated false and defamatory statements to the Romanian police, the media, and another United States citizen about the Tate Brothers during your time at the Tate Brothers' Romanian residence. Your false statements are slanderous, libelous, and defamation per se, as you knowingly made false statements, both oral and written, about our Client. Their defamatory meaning is apparent on their face without explanation. In particular, in April 2022, you repeatedly told a third party that our Client did not allow you to leave the Tate Brothers' residence. You were allowed to leave at any time. Guards present at the Tate Brothers' residence are a standard safety precaution measure as the Tate Brothers are public figures. The security measures carried out by the guards at the Tate Brothers' Romanian residence did not prevent you from being able to leave on your own accord. You have also falsely stated and repeated to third parties that you did not have your mobile phone, but you had your mobile phone the entire time during your stay at the Tate Brothers. At that time, you had the freedom to call the police if you were in danger, but you failed to contact the local authorities. You further stated that the Tate Brothers' have ties to the Russian and Romanian mafia. This statement is false as our Client does not have any ties to either the Russian or Romanian mafia. You also gave false and defamatory statements to police that the Tate Brothers human trafficked you and held you and other women against their will. This statement is unequivocally false, defamatory, and there is not any evidence to substantiate the accusation that you or any other women residing at the Tate Brothers' home were human trafficked or suffered any form of abuse as a result of our Client.

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Tristan Tate ('Tristan') met you while in the United States and you described your desire to leave the United States and come to Romania to be with Tristan. Although Tristan could not offer you his constant presence, mostly being away due to business, he gave you the attention needed to settle in Romania. You admitted that you came to Romania on your own will without any coercion to be close to Tristan, who you were dating at the time. You voluntarily participated in the events and parties in which Tate Brothers were involved and were treated as a friend to the Tate Brothers. You were also on the list of people who could visit and leave the Romanian residence at any time. You then conveyed to your friend who is an American citizen, who was later found out to be your boyfriend in the United States, that you were held against your will in Romania and you sent him the location. This individual then notified the United States American Embassy in Romania which notified the Romanian authorities about your complaint, thus opening a criminal case against our Client. At that time, a home search warrant was ordered and conducted against the Tate Brothers to identify you, and other persons alleged to be deprived of their liberty.

Your defamatory statements are malicious and deliberately false. Our Client has evidence to prove that your statements are false and defamatory. You have portrayed our Client as persons accused of committing criminal acts, suffering in this sense an image that has had negative effects on our Client's online presence and reputation. Our Client denies that he held you against your will, raped you, or human trafficked you or the women who resided at their Romanian residence. You have deliberately told false statements about our Client and repeated these statements to third parties. You do not have the privilege or legal standing to make the aforementioned statements about our Client. These defamatory statements were done with actual malice because you intentionally published these statements in writing and orally to third parties. These false statements are willful, intentionally malicious, done with reckless disregard for their truth, and are reasonably capable of sustaining an incorrect and defamatory meaning about our Client. Due to their harmful and misleading nature, these false statements could be determined to have caused our Client reputational and financial damage.

We have also received notice that Tabbara Mona and William Gabbey, have been repeating the aforementioned false and defamatory statements mentioned above about our Client to various third parties. As such, both individuals have been included as Respondents in this letter and we will also be taking immediate action against these Respondents if this matter is not immediately resolved as discussed below.

CEASE AND DESIST REQUEST

You are hereby requested to cease and desist any and all illegal defamation, slander and/or libel, and recant all false and incorrect statements about our Client. Failure to comply with this cease and desist request, including all requests herein, and/or failure to return the signed assurance within the stipulated time, will leave us with no other alternative but to pursue all available legal remedies.

The legal remedies will include, but are not limited to:

- filing a motion for injunctive relief;
- \$100 million monetary damages against Emma Aida individually;
- \$100 million monetary damages against Tabbara Mona individually;
- \$100 million monetary damages against William Gabbey individually;
- filing fee costs;
- court costs; and
- attorney fees

To immediately avoid further legal action against you, you may contact us by phone or email to discuss the retraction of your defamatory statements.

You may email the retraction that recants all false and incorrect statements that you have been spreading that defames our Client by Tuesday, January 31, 2023, at 12:00 p.m. Eastern Standard Time (EST).

If you have additional questions or want to discuss your retraction, you may also contact us by phone before this deadline. Anything short of an immediate retraction that sets the record straight regarding our Client will result in further legal action using all available legal resource.

Damages have exceeded \$300 million in monetary damage and we will be pursuing every single legal avenue possible to remedy this without an immediate retraction. If you do not retract your false and malicious statements against our Client, you will leave our Client with no choice but to treat this as an intentional act made with the intention of destroying our Client's reputation. Please note that we are prepared to vigorously defend our Client in kind. You may immediately retract your statements and end this here with a quick email or phone call.

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- By phone at (972)-370-3203

Please be guided accordingly,

Sincerely,

/s/Lionel Iruk

Lionel Iruk, Esq. Managing Partner & General Counsel
Texas Bar Card Number: 24062796/ California Bar Number: 282096

For and on behalf of:

IRUKE LEGAL INC.

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**ASSURANCE TO CEASE AND DESIST FURTHER ACTS OF
DEFAMATION, SLANDER OR LIBEL**

In accordance with the above request and stipulation, I _____, do hereby agree to immediately cease and desist the defamation of character and/or reputation. And in turn, will release me from all acts of defamation, slander and/or libel relating to this incident referred to in the Cease and Desist Letter dated _____.

HOWEVER, should I act or behave in a such manner that would result in a breach of this agreement, the opposite party will be entitled to filing fees, courts costs and attorney fees in any action which may be filed in an effort to enforce this agreement, in addition to any injunctive relief and monetary damages that it may have been entitled to had this assurance never been signed.

Signature

Print Full Name

Date

Signature

Print Full Name

Date

Signature

Print Full Name

Date